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VIA ECF

November 27, 2024

The Honorable Edward S. Kiel
United States District Judge
United States District Court for the District of New Jersey
Mitchell H. Cohen Building &
United States Courthouse
Fourth and Cooper Streets
Camden, New Jersey 08101

Re: Motion to Consolidate

Dear Judge Kiel:

Pursuant to Local Civ. Rule 42.1, Plaintiffs Salix Pharmaceuticals, Inc., Salix Pharmaceuticals, Ltd., Alfasigma S.p.A., and Bausch Health Ireland, Ltd. ("Plaintiffs") submit this cover letter providing notice that Plaintiffs are submitting a Motion to Consolidate in *Salix Pharmaceuticals, Inc. et al. v. Amneal Pharmaceutical of New York, LLC et al.*, No. 1:24-cv-04607-ESK-AMD. Plaintiffs' Motion seeks to consolidate *Salix Pharmaceuticals, Inc. et al. v. Amneal Pharmaceutical of New York, LLC et al.*, No. 1:24-cv-04607-ESK-AMD; *Salix Pharmaceuticals, Inc. et al. v. Norwich Pharmaceuticals, Inc. et al.*, No. 1:24-07140-ESK-AMD; *Salix Pharmaceuticals, Inc. et al. v. Zydus Pharmaceuticals (USA) Inc. et al.*, No. 1:24-cv-09512-ESK-AMD; *Salix Pharmaceuticals, Inc. et al. v. Cipla USA et al.*, No. 1:24-cv-10213-ESK-AMD; and *Salix Pharmaceuticals, Inc. et al. v. Carnegie Pharmaceuticals LLC et al.*, No. 1:24-cv-10356-ESK-AMD because the five cases present common legal and factual questions. In accordance with Rule 42.1, this cover letter is being filed in each of the above individual actions. A copy of the Motion to Consolidate is enclosed.

Respectfully submitted,



s/ Harvey Bartle IV

Harvey Bartle IV

Enclosure

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cc: All counsel of record with enclosure via ECF or other service in *Salix Pharmaceuticals, Inc. et al. v. Amneal Pharmaceutical of New York, LLC et al.*, No. 1:24-cv-04607-ESK-AMD; *Salix Pharmaceuticals, Inc. et al. v. Norwich Pharmaceuticals, Inc. et al.*, No. 1:24-07140-ESK-AMD; *Salix Pharmaceuticals, Inc. et al. v. Zydus Pharmaceuticals (USA) Inc. et al.*, No. 1:24-cv-09512-ESK-AMD; *Salix Pharmaceuticals, Inc. et al. v. Cipla USA et al.*, No. 1:24-cv-10213-ESK-AMD; and *Salix Pharmaceuticals, Inc. et al. v. Carnegie Pharmaceuticals LLC et al.*, No. 1:24-cv-10356-ESK-AMD.